

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	Civ. No. 21-cv-10429 (JGK)
JULIANNA CZERNYK,	:	
	:	
Plaintiff/Counterclaim-Defendant,	:	
	:	
-against-	:	
	:	
MICHAEL BONGIOVANNI,	:	
	:	
Defendant/Counterclaim-Plaintiff.	:	
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Priya Chaudhry and exhibits attached thereto, the accompanying Memorandum of Law, and upon all prior pleadings filed in this action, Defendant Michael Bongiovanni, by and through his counsel, ChaudhryLaw PLLC, respectfully moves this Court before the Honorable John G. Koeltl, United States District Judge, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, at a date and time to be determined by the Court, for an Order:

- 1) scheduling an expedited hearing on the discrete issues addressed herein;
- 2) directing Ms. Crumiller to immediately remove the blog post page from her website;
- 3) directing Ms. Crumiller and Plaintiff to immediately remove their re-posts of the blog post from all other platforms; and
- 4) issuing a temporary gag order for Ms. Crumiller, and her agents, pending the outcome of the hearing on this issue.

Dated: New York, New York
January 28, 2022

Respectfully submitted,
ChaudhryLaw PLLC

By: /s/ Priya Chaudhry
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